

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE No. 20 CIV. 7311 (LAK) (JLC)

E. JEAN CARROLL,

Plaintiff,

-vs-

DONALD J. TRUMP,
in his personal capacity,

Defendant.

_____/

= = =

CONFIDENTIAL

= = =

VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

Wednesday, October 19, 2022
10:22 a.m. - 3:50 p.m.

The Mar-a-Lago Club
1100 South Ocean Boulevard
Palm Beach, Florida, Florida

Stenographically Reported By
Pamela J. Pelino, RPR, FPR, CLR
Notary Public, State of Florida
TSG REPORTING
JOB NO. 218342

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1 D. J. TRUMP

2 A. Other people in the press, yes.

3 Q. If you could read -- if you're able to --
4 and I apologize for the size of the text.

5 If you could read that statement into the
6 record.

7 A. You want me to read the whole thing?

8 Q. Please.

9 A. It's a very unclear copy. Do you have a
10 better copy of it?

11 Q. I think this is the best we have. I
12 could read it in. I'll read it in.

13 A. Yeah, why don't you read it in.

14 Q. It says: "Statement from President
15 Donald J. Trump. Regarding the 'story' by
16 E. Jean Carroll claiming she once encountered me at
17 Bergdorf Goodman 23 years ago, I've never met this
18 person in my life. She's trying to sell a new book.
19 That should indicate her motivation. It should be
20 sold in the fiction section. Shame on those who
21 make up false stories of assault, who try to get
22 publicity for themselves or sell a book or carry out
23 a political agenda like Julie Swetnick, who falsely
24 accused Justice Brett Kavanaugh. It's just as bad
25 for people to believe it, particularly when there is

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2 zero evidence. Worse still for a dying publication
3 to try to prop itself up by pedaling fake news.
4 It's an epidemic. Ms. Carroll in New York Magazine:
5 No pictures, no surveillance, no videos, no reports,
6 no sales attendants around??? I would like to thank
7 Bergdorf Goodman for confirming they have no video
8 footage of any such incident because it never
9 happened. False accusations diminish the severity
10 of real assault. All should condemn false
11 accusations and any actual assault in the strongest
12 possible terms. If anyone has information that the
13 Democratic party is working with Ms. Carroll or
14 New York Magazine, please notify us as soon as
15 possible. The world should know what's really going
16 on. It's a disgrace, and people should pay dearly
17 for such false accusations." Do you see that?
18 That's what you have in front of you?

19 A. Yeah.

20 Q. And I think you've already confirmed that
21 this is a statement that you gave to someone on your
22 staff to give to the press?

23 A. Yeah.

24 Q. And that's how it ended up in
25 Laura Littman's tweets?

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2 A. Perhaps, yes.

3 Q. Sitting here today, do you stand by this
4 statement?

5 A. Yes.

6 Q. Sitting here today, are there any
7 inaccuracies in this statement that you now know of?

8 A. Not that I can see, no. The only thing
9 that I would say is -- and I've just heard this --
10 that she has no idea when this event took place, and
11 somehow 23 years is mentioned, 23 years ago. It's a
12 long time. But she has no idea supposedly when this
13 took place, what season, what year, what month, what
14 day. She knows nothing. And for some reason, it's
15 put down here 23 years ago. So, you know, at one
16 point I was told 23 years. But I've heard since she
17 really has no clue when this took place supposedly,
18 which -- it didn't take place.

19 Q. So is it your testimony that when
20 Ms. Carroll made her allegations, she had -- putting
21 aside what day it happened that she had no idea
22 whatsoever of what year it took place?

23 A. My lawyers told me that.

24 Q. Okay. I don't want to know what your
25 lawyers told you.

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this.

BY MS. KAPLAN:

Q. And I take it -- is it fair to say that when you made comments while you were president on your way to somewhere, on your way to an event, on your way to boarding Air Force One or Marine One that a transcript would be created like this and released by your press office?

A. Oftentimes, yeah.

Q. Are you better able -- this is a long one. Let's try to do this, sir. Are you better able to read the writing in this document than the previous document?

A. I can. You could read it. But why don't you read it?

Q. You want me to read it?

A. Yeah.

Q. When my son was little, I couldn't stand reading books to him because you had to read it so slow, and it would drive me nuts. But I'm going to try to read it slow.

At the bottom of page 1800, it says "The President," colon, and then it says as follows:

"I have no idea who this woman is. This

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2 is a woman who has also accused other men of things
3 as you know. It is a totally false accusation. I
4 think she was married, as I read. I have no idea
5 who she is, but she was married to an actually nice
6 guy, Johnson, a newscaster.

7 "Question: You were in a photograph with
8 her?

9 "The President: Standing with coat on in
10 a line -- give me a break -- with my back to the
11 camera. I have no idea who she is. What she did
12 is -- it's terrible, what's going on. So it's a
13 total false accusation, and I don't know anything
14 about her, and she's made this charge against
15 others. And, you know, people have to be careful
16 because they're playing with very, very dangerous
17 territory."

18 Am I going slow enough?

19 A. Yeah, you're going fine.

20 Q. "And when they do that -- and it's
21 happening more and more. And when you look at what
22 happened to Justice Kavanaugh and when you look at
23 what's happening to others, you can't do that for
24 the sake of publicity. New York Magazine is a
25 failing magazine. It's ready to go out of business

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2 from what I hear. They'll do anything they can, but
3 this was about many men. And I was one of the many
4 men that she wrote about. It's a totally false
5 accusation. I have absolutely no idea who she is.
6 There's some picture where we're shaking hands. It
7 looks like it's some kind of event. I have my coat
8 on. I have my wife standing next to me. And I
9 didn't know her husband, but he was a newscaster.
10 But I have no idea who she is. None whatsoever.
11 It's a false accusation, and it's a disgrace that a
12 magazine like New York -- which is one of the
13 reasons it's failing. People don't read it anymore.
14 So you're trying to get readership by using me.
15 It's not good. You know, there were cases that the
16 mainstream media didn't pick up, and I don't know if
17 you've seen them, and they were put on Fox. But
18 there were numerous cases where women were paid
19 money to say bad things about me. You can't do
20 that. You can't do that. And those women did wrong
21 things, that women were actually paid money to say
22 bad things about me. But here's a case. It's an
23 absolute disgrace that she's allowed to do that."

24 You made that statement, correct?

25 A. Read the last part, please.

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2 Q. "But here's a case. It's an absolute
3 disgrace that she's allowed to do that."

4 A. Yes.

5 Q. Okay. And I'm going to ask the same
6 questions I asked last time.

7 I take it you stand by that statement
8 today?

9 A. Yes.

10 Q. Sitting here today, are you aware of any
11 inaccuracies in your statement? I'm not asking
12 about her allegation. About your statement.

13 A. No. I think it's pretty much fine. I
14 can't -- I haven't reviewed it in great detail, but,
15 you know, it was standing outside of a helicopter
16 that was getting ready to take off. But, no, that
17 was -- that -- the statement is, in my opinion,
18 correct.

19 Q. Okay. And just so the record is clear,
20 if at any point you come across any inaccuracies,
21 please don't hesitate to let us know.

22 Let's go now to the third statement,
23 which we're going to mark as DJT 22.

24 (DJT Exhibit 22 was marked for
25 identification.)

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2 work out those problems for herself. Now, like
3 everyone else, she gets paid by a radical,
4 left-leaning publisher to say bad and untrue
5 things." Do you see that?

6 A. Yeah.

7 Q. I want to focus on the very last
8 sentence, which says: "Now, like everyone else, she
9 gets paid by a radical, left-leaning publisher to
10 say bad and untrue things."

11 A. Yeah.

12 Q. Do you know who her publisher was?

13 A. No. I just heard it was a publisher that
14 did some very bad books on us.

15 Q. I'll represent to you her publisher was
16 Harper Collins.

17 A. Yeah. And they haven't been great.

18 Q. Do you know who published your
19 son-in-law, Jared Kushner's book?

20 A. Could be, but they published some very
21 bad ones too.

22 Q. What is Truth Social?

23 A. It's a platform that's been opened by me
24 as an alternative to Twitter.

25 Q. And your handle on Truth Social is

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2 @realdonaldtrump?

3 A. I believe so, yes.

4 Q. And as of today, you have approximately
5 four million followers on Truth Social?

6 A. I don't know the number. I know
7 Truth Social is doing very well. I think it was
8 number one ahead of TikTok, number one ahead of
9 Twitter, number one ahead of Instagram and everyone
10 else for the last number of days. I just noticed
11 that. Somebody put it on my desk. They have the
12 ratings, and they said Truth Social is hot.

13 Q. And I'll represent to you, sir, that we
14 looked it up, and it showed, at least as of the last
15 time we looked, you had around four million -- a
16 little bit over four million followers.

17 A. On me personally.

18 Q. On you personally.

19 A. Not Truth Social, on me. I don't know.
20 That's possible.

21 Q. Okay. And like Twitter, people have the
22 ability to repost, or I think as you used the
23 expression in Truth Social, "retruth" posts that you
24 make from your @realdonaldtrump account; correct?

25 A. I think so, yes. Yes, they do.

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2 Q. And people have the opportunity to like
3 or heart one of your posts as well; correct?

4 A. Could be.

5 Q. Okay. Now, on October 12, just a few
6 days ago, you issued a statement on Truth Social
7 about Ms. Carroll and this case; correct?

8 A. I believe so, yes.

9 Q. And the statement that you posted, who
10 wrote that statement?

11 A. I did.

12 Q. You yourself?

13 A. Yeah.

14 Q. Did you post the statement yourself?

15 A. Yes.

16 Q. And in addition to posting the statement
17 on Truth Social, you also sent it to the press?

18 A. Yes. It's called truth and post. We
19 post much like -- how would you say it? We put out
20 a statement, and we also put it on Truth.

21 Q. And when you say you put it out --

22 A. Like a public relations statement.

23 Q. It goes, like, to an email list of
24 reporters?

25 A. Yeah, whatever. Yeah. The bigger grab

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2 is The Truth, but we also -- we call it posts. We
3 have -- actually it's truth and post. So we call it
4 post. But the bigger -- the more important of the
5 two is The Truth because people are watching it.

6 Q. And in that sentence, you just used the
7 word "we." Does someone help you --

8 A. Well, I'm talking about me.

9 Q. Okay. But --

10 A. But when I say "we," I'm talking about
11 perhaps Truth because Truth has, you know, people
12 working for it, quite a few people.

13 Q. Okay. But you didn't personally send the
14 email to the reporters yourself, did you?

15 A. No. What they do is they take it from
16 Truth, and then they'll put it out as a press
17 release.

18 Q. And that's what I'm trying to ask, sir.
19 Who's "they"?

20 A. Different people that work in the
21 organization in Truth or -- some cases my office.

22 Q. And with this statement, do you recall
23 whether it was people who worked for Truth Social or
24 your office?

25 A. I believe we put it out through my

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2 office.

3 Q. And who in your office would have been
4 responsible for doing that?

5 A. Possibly -- maybe Margo or maybe
6 Chamberlain, Chamberlain Harris.

7 Q. So Chamberlain Harris and -- I don't know
8 Margo's last name.

9 A. One or two of the people in the office
10 would have done it.

11 Q. What's Margo's last name?

12 A. Excuse me?

13 Q. Do you know Margo's last name?

14 A. Margo Martin.

15 Q. Trying to interpret the last several
16 questions and answers.

17 When you post something on Truth Social,
18 does it always go to the press ultimately, or does
19 someone make that decision?

20 A. Pretty automatic.

21 Q. Okay.

22 A. It goes to the press really directly on
23 Truth too. So most people have it before they get
24 the Post.

25 Q. And I take it when it goes to the

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2 on October 12, 2022, and a blown-up version because
3 we appreciate that the type is very small. A
4 blown-up version that should be more legible.

5 A. I can see it, yeah.

6 Q. Would you like me to read it into the
7 record?

8 A. Yeah, go ahead. Sure.

9 Q. So it says: "October 12, 2022, statement
10 by Donald J. Trump, forty-fifth President of the
11 United States of America. This 'Ms. Bergdorf
12 Goodman case' is a complete con job, and our legal
13 system in this country but especially in New York
14 State (just look at Peekaboo James) is a broken
15 disgrace. You have to fight for years and spend a
16 fortune in order to get your reputation back from
17 liars, cheaters, and hacks. This decision is from
18 the judge who was just overturned on my same case.
19 I don't know this woman, have no idea who she is
20 other than it seems she had a picture of me many
21 years ago with her husband shaking my hand on a
22 reception line at a celebrity charity event. She
23 completely made up a story that I met her at the
24 doors of this crowded New York City department store
25 and within minutes 'swooned' her." "Swooned" is in

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quotes.

"It is a hoax and a lie just like all the other hoaxes that have been played on me for the past seven years, and while I'm not supposed to say it, I will. This woman is not my type! She has no idea what day, what week, what month, what year, or what decade this so-called 'event' supposedly took place. The reason she doesn't know is because it never happened, and she doesn't want to get caught up with details or facts that could be proven wrong. If you watch Anderson Cooper's interview with her where she was promoting a really crummy book, you will see that it is a complete scam. She changed her story from beginning to end after the commercial break to suit the purposes of CNN and Andy Cooper. Our justice system is broken along with almost everything else in our country. Her lawyer is a political operative and Cuomo crony who goes around telling people that the way to beat Trump is to sue him all over the place. She is suing me on numerous frivolous cases just like this one, and the court system does nothing to stop it.

"In the meantime and for the record, E. Jean Carroll is not telling the truth, is a woman

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2 I had nothing to do with, didn't know, and would
3 have no interest in knowing her if I ever had the
4 chance. Now all I have to do is go through years
5 more of legal nonsense in order to clear my name of
6 her and her lawyer's phony attacks on me. This can
7 only happen to 'Trump'!"

8 Did I read that correctly?

9 A. Great statement, yeah. True. True.

10 Q. And now that you've heard it again and
11 you have it in front of you, you again confirm that
12 you wrote the whole thing yourself?

13 A. I wrote it all myself. All myself.

14 Q. Did you talk to anyone before you wrote
15 it? Did you talk to anyone about what to say in the
16 statement?

17 A. No. I didn't need to. I'm not Joe
18 Biden.

19 Q. In this statement you say, I think, for
20 the first time that it was a charity event, that
21 photo. It was a charity event that --

22 A. That was what I was told, yeah. I was
23 told it was a charity event. Nobody knows which
24 event it was, but it was like a charity event.

25 Q. Do you know -- remember who told you